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January 19, 2017

**VIA ELECTRONIC FILING (ECF)**

Honorable Loretta A. Preska  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: Mayfield et al. v. Asta Funding, et al. 14-cv-2591 (LAP)(JLC)

Dear Judge Preska:

As noted in earlier correspondence, the parties have reached a class-wide settlement of claims against the Pressler Defendants and the former Asta Defendants (together, "Defendants"). (The Class's claims against the Asta Defendants were terminated without prejudice following individual settlements with the named plaintiffs, but will be reinstated for the purpose of entering the global settlement). The parties jointly write to inform the Court that we have committed to the following terms:

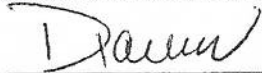
1. Defendants agree to the certification of a settlement class.
2. Defendants will pay \$3.9 million to be distributed as relief to the class.
3. Class counsel may seek reasonable attorneys' fees and expenses in the amount of \$787,500.
4. Defendants will cease collecting on the underlying judgments against class members.
5. Defendants will continue to negotiate in good faith with regard to a procedure for vacating the underlying state court judgments against class members.
6. The parties will continue to discuss the mechanics and timing of the Pressler Defendants' payments into the settlement fund.
7. Class members and Defendants will provide appropriate mutual releases.

The parties intend to submit materials setting forth the settlement terms in full detail, and will seek the Court's preliminary approval of the settlement at that time. We propose to submit a status update to the Court addressing the mechanics and timing of the preliminary approval process on or before February 14, 2017. In the meantime, however, we respectfully request that the Court So-Order this letter to reflect the parties' commitment to the settlement terms as set forth herein.

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Respectfully submitted,


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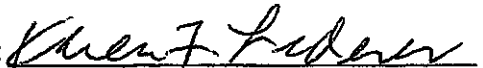
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**SO-ORDERED**

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Honorable Loretta A. Preska  
United States District Judge